EXHIBIT G

Subject: Re: JAMES V. EXPERIAN: Draft Protective Order, Draft Scheduling Order, and Courtesy Copies of Reply Brief Attached

From: Leonard Bennett   04/23/2013 07:31 PM

To: Edward M Wenger

Cc: Matt Erausquin, Joseph W Clark, Joseph Graziano III, "Daniel J. McLoon"

Counsel:

We do not believe that a Blanket Protective Order is appropriate in this case. We understand your position that certain documents may be critical trade secrets and we will quickly meet and confer with you regarding each category or specific set of documents as needed.

Our concerns are based upon Experian's historical overuse of POs in this state and others. Further, you have not even honored the previous Scroogins agreement regarding Experian's 26a1 production to take place in all of our firm's cases. Not in this case and not in others. (Recall that that agreement was to resolve these PO fights once and for all after Judge Payne harshly chastised the two sides for the use of just such a Blanket PO).

As a further note - you altered what had been our standard PO, did so discretely and did not provide a redline. I assume by accident.

Len

On Apr 23, 2013, at 12:22 PM, Edward M Wenger wrote:

> Len and Matt,
>
> Please find attached draft of the amended scheduling order. We are also attaching a draft protective order---which we initially circulated a few weeks back---and courtesy copies of the reply that was filed yesterday.
>
> Please let me know if you have any questions.
>
> Best,
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> -Ed
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>
> <u>Draft Scheduling Order</u>
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> <u>Draft Protective Order</u>
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>
> <u>Courtesy Copies of Reply, with Exhibits</u>

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